



April 3, 2018

BY ELECTRONIC FILING

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Submission, Amendment of Parts 2 and 25 of the Commission's Rules to Facilitate the Use of Earth Stations in Motion Communicating with Geostationary Orbit Space Stations in Frequency Bands Allocated to the Fixed Satellite Service, IB Docket No. 17-95

Dear Ms. Dortch:

The record in this proceeding demonstrates how earth stations in motion ("ESIMs") can operate across the United States without causing unacceptable interference to Iridium's feeder link operations in the same portion of the Ka-band.¹ While the proposed operational approaches of the signatories of this letter may differ to a limited degree, the ultimate conclusion is the same – ESIM operations are inherently able to share spectrum with Iridium's limited feeder link operations.

Therefore, SES Americom and its affiliate O3b Limited, Viasat and Inmarsat (the "FSS Operators") recommend that the Commission adopt a policy statement acknowledging that it can license ESIM operations across the United States in spectrum currently utilized by Iridium where an ESIM applicant demonstrates that its operations will not have a significant impact on Iridium's licensed and actual feeder link operations. Depending on the ESIMs technology employed, this showing may be across the entire United States. For any geographic areas where such a showing cannot be made, an applicant may also pursue an ESIMs license pursuant to Section 25.258 of the Commission's rules, 47 C.F.R. §25.258(a), and its good faith coordination requirements.

¹ Viasat, Inc. and Inmarsat, Notice of *Ex Parte* Presentation, filed in IB Docket No. 17-95, Nov. 6, 2017; Viasat, Inc., Notice of *Ex Parte* Presentation, filed in IB Docket No. 17-95, Feb. 5, 2018; Viasat, Inc., *Ex Parte* Submission, filed in IB Docket No. 17-95, Mar. 23, 2018; Inmarsat, Notice of *Ex Parte* Submission, filed in IB Docket No. 17-95, Feb. 16, 2018; SES Americom, Inc. and O3b Limited, Notice of *Ex Parte* Presentation, filed in IB Docket No. 17-95, Feb. 14, 2018.

In order to maximize use of the limited spectrum resource, the FSS Operators encourage the Commission to adopt this policy approach which would ensure that unused spectrum is not held hostage to an otherwise protracted coordination process.

Respectfully submitted,

/s/ Suzanne Malloy

Suzanne Malloy
Vice President, Regulatory Affairs
O3b Limited
900 17th Street, NW
Suite 300
Washington, DC 20006
(202) 813-4026

/s/ Giselle Creeser

Giselle Creeser
Director, Regulatory
Inmarsat
1101 Connecticut Ave, NW
Suite 1200
Washington, DC 20036
(202) 248-5150

/s/ Petra A. Vorwig

Petra A. Vorwig
Senior Legal and Regulatory Counsel
SES Americom, Inc.
1129 20th Street, NW
Suite 1000
Washington, DC 20036
(202) 478-7143

/s/ Christopher J. Murphy

Christopher J. Murphy
Associate General Counsel, Regulatory Affairs
Daryl T. Hunter
CTO, Regulatory Affairs
Viasat, Inc.
6155 El Camino Rd.
Carlsbad, CA 92009
(760) 893-3269